

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Attorney for the Debtor(s)

By: Justin M. Gillman, Esq.

In Re:

Theron Cromer
Mechela Bailey

Case No.: 16-31373

Judge: MBK

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (**choose one**):

1. ☒ Motion for Relief from the Automatic Stay filed by HSBC Bank USA (Wells Fargo) , creditor,

A hearing has been scheduled for 10/3/2017 , at 10:00 a.m. .

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for _____ , at _____ .

- ☐ Certification of Default filed by _____ ,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

- ☐ Payments have been made in the amount of \$ _____ , but have not been accounted for. Documentation in support is attached.

☒ Payments have not been made for the following reasons and debtor proposes

repayment as follows (**explain your answer**):

Husband has been out of work since April 2017 due to injury on job. Expects to return to work October 2, 2017. Debtor proposes to resume payments upon resumption of work. Debtor is speaking with family members regarding possible assistance to address arrears.

☒ Other (**explain your answer**):

Debtor was denied loan modification due to lack of income but upon resumption of work intends to reapply with changed financial circumstances.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 9/26/17

/s/ Theron Cromer
Debtor's Signature

Date: 9/26/17

/s/ Mechela Bailey
Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.